EXHIBIT 2

```
Page 1
 1
                  UNITED STATES DISTRICT COURT
 2
               NORTHERN DISTRICT OF CALIFORNIA
 3
                     SAN FRANCISCO DIVISION
 4
 5
     WAYMO LLC,
                                    )
            Plaintiff,
 6
 7
     VS.
                                   ) Case No.
 8
     UBER TECHNOLOGIES, INC.; ) 3:17-CV-00939-WHA
 9
     OTTOMOTTO LLC; OTTO TRUCKING )
10
     LLC,
11
            Defendants.
         HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY
12
13
14
     OTTO TRUCKING LLC'S VIDEOTAPED 30(b)(6) DEPOSITION OF
15
                       PIERRE-YVES DROZ
16
                     Palo Alto, California
17
                    Tuesday, August 22, 2017
18
                            Volume I
19
20
     Reported by:
     CATHERINE A. RYAN
21
22
     CMR, CRR, CSR No. 8239
2.3
     Job No. 2685937
24
25
     PAGES 1 - 92
```

1	0 444	1	I reconsidered at the time, and then having those 14:46:32
2	Q At these at these open garages was 14:43:52	2	devices home was more information that I considered
3	there someone available to answer questions about	3	
4	how the LiDAR devices worked? A There was.	4	as probably not being a good idea. Q Other than Mr. Levandowski, was anyone
5		5	else aware of the fact that you had a TBR device at 14:46:47
		6	home?
6 7	A So in I'm sorry. In Mountain View there was me.	7	A I'm not sure. Maybe. I'm not sure,
8	O And what about in Austin and Phoenix?	8	actually.
9	A And I think Gill was one of them for	9	Q Would Mr. Urmson have known?
10	one of the achievements, I think, was the Phoenix 14:44:11	10	A I don't think he knew. 14:46:59
11	event, but I'm not sure, and I'm not sure who was	11	Q Or Mr. Salesky?
12	there for the Austin event.	12	A I don't think he knew.
13	Q Anyone else?	13	Q Other than Mr. Pennecot and you, are you
14	A Not that I know of.	14	aware of anyone else keeping any momentos, printed
15	Q Did GBr2 have ? 14:44:2.		circuit boards associated with Google's LiDAR 14:47:11
16	MR. JAFFE: Objection. Beyond the scope.	16	devices?
17	THE WITNESS: GBr2 has	17	MR. JAFFE: Object to form.
18	not anything you can see from looking at the	18	THE WITNESS: I remember I got Laila maybe
19	outside, though. That's for sure.	19	at some point, like I know she had one at her
20	BY MR. CHATTERJEE: 14:44:39	20	desk. I don't know if it ever left Google, though. 14:47:27
21	Q Are you aware of any public disclosures of	21	BY MR. CHATTERJEE:
22		22	O Who is Laila?
23	the printed circuit boards for any of the LiDAR devices used by Waymo or Google?	23	A Laila Mattos.
24	MR. JAFFE: Object to form.	24	O And who what was her role?
25	THE WITNESS: I'm not aware of any public 14:44:5		A Project manager. I think it stayed on her 14:47:36
23		2 23	
	Page 30		Page 32
1	disclosure. 14:44:53	1	desk, but 14:47:39
2	BY MR. CHATTERJEE:	2	Q And what what device was on her desk?
3	Q Are you aware of anybody keeping printed	3	A A PBR5.
4	circuit boards as momentos when they've either left	4	Q Is PBR5 in use today?
5	Waymo or Google or just even as they've continued as 14:45:0	6 5	A No. 14:47:50
6	employees?	6	Q Why not?
7	A I'm aware of a few instances there. None	7	A It was
8	of these were GBr circuit boards, just to make sure.	8	MR. JAFFE: Object to form
9	Q So tell me what those instances are.	9	THE WITNESS: Sorry.
10	A So the I know that Gaetan had kept, I 14:45:20	10	MR. JAFFE: and outside the scope. 14:47:53
11	guess, a PBR5, and I brought home, like, a PBR5 and	11	THE WITNESS: PBR5 is the much earlier
12	a TBR, which had been brought back to to Google a	12	version to the PBR we use today. It's a very
13	few months later.	13	different very different capabilities, very
14	Q When did you take that momento?	14	different technology, and I think we we stopped
15	A I think that was Anthony was still 14:45:46	15	using it probably, like, three years ago-ish. 14:48:08
16	around because he was the one who told us we could	16	Something like that.
17	do that. So it was probably I mean, I guess a	17	MR. CHATTERJEE: I'm going to mark this as
18	year and two years ago maybe.	18	1826.
19	Q And why did you bring the TBR board back?	19	(Exhibit 1826 was marked for
20	A So that was a that was	20	identification by the court reporter.) 14:48:32
	The you know, after	21	BY MR. CHATTERJEE:
22	Anthony left and things got a bit complicated not	22	Q I've marked the document as 1826. I'm
23	complicated sorry that things got there was	23	going to give you the physical specimens in a
24	a lot of there was a lot of information that	24	minute. I just want to have a record of what it is
25	Anthony, like, had fed me that I thought was that 14:46:27	25	I'm giving you. These are pictures of each side of 14:48:
	Page 31		Page 33

A Okay, What are those boards? A Okay, What are those boards? A Dokay, What are those boards? A Those boards are early version of the GBr2 transmit boards. A Those boards are early e	1	the device that I'm giving you. 14:48:46	1	A No, I was not at her goodbye party. 14:50:38
a sa giff at a going away party? A Yeah. 14:48:54 O Do you recognize these devices, Mr. Droz? A Let me look at the identification number on it. O I can give you a magnifying glass if it would be helpful. 14:49:12 in discovery? MR. JAFFE: His this been made available in MR. JAFFE: Hory just making available in discovery? MR. GHATTERJEE: It is now. MR. JAFFE: From where? MR. JAFFE: From where? MR. GHATTERJEE: I just got them. MR. JAFFE: From where? MR. GHATTERJEE: I just got them. MR. JAFFE: From where? MR. GHATTERJEE: I just got them. MR. JAFFE: From where? MR. GHATTERJEE: I just got them. MR. JAFFE: Where is most just an intervention of the GBr2 A I mean, documents, no, but the boards, yes. Jay 20 A I mean, documents, no, but the boards, yes. Page 34 O Okay. What are those boards? A I mean, documents, no, but the boards, transmit boards. Q Okay. What are those boards? A I mean, documents, no, but the boards, yes. Page 34 O Okay. What are those boards? A I mean, documents, no, but the boards, transmit boards. Q Okay. What are those boards? A These boards are early version of the GBr2 A Those boards are early version of the GB		0 00		
you can open the bag and take it out. A Yeah. 14:48:54 Q Do you recognize these devices, Mr. Droz? A Let me look at the identification number on it. Q I can give you a magnifying glass if it would be helpful. Will be will be will be helpful. Will be will be will be helpful. Will be wi		•	3	
14-50 A Yeah 14-48-54 5 Q Okay, And — and you were never present 14-50 6 In any of those meetings?			4	
Solution Company Com			5	
A Let me look at the identification number on it. On it. Q I can give you a magnifying glass if it would be helpful. 14.49:12 in discovery? 15 MR. JAFFE: Has this been made available in discovery? 16 MR. CHATTERJEE: It is now. 17 MR. CHATTERJEE: It is now. 18 MR. CHATTERJEE: It is now. 19 MR. CHATTERJEE: It is now. 10 MR. CHATTERJEE: It is got them. 10 MR. CHATTERJEE: It got them. 11 MR. CHATTERJEE: It got them. 12 MR. CHATTERJEE: It got them. 13 MR. CHATTERJEE: It got them. 14 MR. CHATTERJEE: It got them. 15 MR. CHATTERJEE: It got them. 16 MR. CHATTERJEE: It got them. 17 MR. CHATTERJEE: It got them. 18 MR. CHATTERJEE: It got them. 19 Out soon enough. 10 Q Go ahead, Mr. Droz. 21 A Okay. So- sorry. What is your question? 22 question? 23 Q Do you recognize these documents? 24 A I mean, documents, no, but the boards. 25 yes. I 4:49:38 1 Q Okay. What are those boards? 1 L4:49:38 1 Q Okay. What are those boards? 1 L4:49:38 1 Q Okay. What are those boards? 1 L4:49:38 1 Q Okay. If you would look - you can use 1 the magnifying glass if it would be helpful. It's 14:49:47 2 mannit boards. Q Okay. If you would bok - you can use 3 the magnifying glass if it would be helpful. It's 14:49:47 2 mannit boards. Q Okay. If you would be helpful. It's 14:49:47 2 mannit boards. Q Okay. If you would be helpful. It's 14:49:47 2 mannit boards. Q Okay. If you would be helpful. It's 14:49:47 2 mannit boards. Q Okay. If you would be helpful. It's 14:49:47 2 mannit boards. Q Okay. If you would be helpful. It's 14:59:47 3 mannit boards. 4 A Yes, but are diodes. The left one 14:5 4 A Yes, Lou and them. 4 A Yes, Lou and them. 5 the magnifying glass if it would be helpful. It's 14:49:47 5 mannit boards. Q Okay. If you would look - you can use 10 stide of those. Do you see those? Do you know what 14:50:16 20 A Are you familiar with anyone giving 14:50:16 21 A Those pooned as a gift? 22 A Yes, Lou and them. 23 Q Okay. And so you're not familiar with 24 A Yes, Lou and the boards as 25 G			6	
on it. Q Can give you a magnifying glass if it would be helpful. 14:49:12 in discovery? MR. JAFFE: Has this been made available in discovery? MR. JAFFE: Has this been made available in that you had devices in discovery? MR. JAFFE: From where? MR. JAFFE: From where? MR. JAFFE: From where? Q Go ahead, Mr. Droz. 14:49:12 A Okay, So - sorry. What is your question? Q Do you recognize these documents? A I mean, documents, no, but the boards, yes. 14:49:38 Q Do you recognize these documents? A I mean, documents, no, but the boards, yes. 14:49:38 Q Do you recognize these documents? A Those boards are early version of the GBt2 A Those boards are ea			7	
9 Q I can give you a magnifying glass if it 10 would be helpful. 14:49:12 11 MR. JAFFE: Has this been made available 12 in discovery? 12:49:17 13 MR. CHATTERJEE: It is now. 13 14 MR. JAFFE: You're just making available 15 15 that you had devices in discovery? 14:49:17 16 MR. CHATTERJEE: Just got them. 16 17 MR. CHATTERJEE: Just got them. 17 18 MR. CHATTERJEE: Just got them. 17 19 Out soon enough. 19 19 Out soon enough. 19 20 Q Go ahead, Mr. Droz. 14:49:23 21 A Okay. So sorry. What is your question? 21 22 A Those beards are early version of the GBr2 22 23 Q Do you recognize these documents? 24 24 A I mean, documents, no, but the boards, 25 25 yes. 14:49:38 25 26 A Those beards are early version of the GBr2 25 27 transmit boards. 29 28 A Veah. 20 29 Q Go ahead, Mr. Droz. 14:49:38 20 Q Naw, What are those boards? 14:49:38 21 Q Okay. What are those boards? 14:49:38 22 A Those beards are early version of the GBr2 25 23 transmit boards. 20 24 A Those beards are early version of the GBr2 25 25 transmit boards. 20 26 Q Okay. If you would look - you can use the magnifying glass if it would be helpful. It's 14:49:47 26 Bond them 27 27 Do you see that? 30 28 A Vesh, that would be two versions of it. 30 39 Q Now, there's something attached to the 31 31 those are? 30 32 Q Do you recognize these documents? 31 33 transmit boards. 40 34 A This one doesn't have diodes. The left one 14:5 does have diodes. 31 35 Transmit boards. 40 36 Q Now, when I look at those, can I tell that the thread of the side of those. Do you see ther? 31 36 Q Now, there's something attached to the 32 37 A They look like ear like -1 don't have diodes. 31 38 A Veah. Can I see? 31 39 Q Now, there's something attached to the 32 30 Q Now, there's something attached to the 34 31 A No. Ji just bare PCB. 34:51:40 32 Q Now there's something attached to the 34:50:16 33 A Veah. Can I see? 31 34 A Yeah. Can I see? 35 35 A Yeah. Can I see? 35 36 A Yeah. Can I see? 34 37 A Yeah. Can I see? 34 38 A Yeah. Can I see? 35 39 A Yeah. Can I see? 35 30 A Yeah. Can I se				
Would be helpful. 14:49:12 10				
actually had earrings that were the two printed in discovery? MR. JAFFE: You're just making available that you had devices in discovery? 14:49:17 15 14:49:17 16 MR. CHATTERJEE: I just got them. 16 MR. JAFFE: From where? 14:49:17 17 18 MR. CHATTERJEE: Yesterday. You'll find out soon enough. 19 19 19 19 19 19 19 1				
in discovery? MR. CHATTERJEE: It is now. MR. JAFFE: You're just making available that you had devices in discovery? MR. CHATTERJEE: I just got them. MR. JAFFE: From where? MR. CHATTERJEE: I just got them. MR. JAFFE: From where? MR. CHATTERJEE: Yesterday. You'll find out soon enough. Q Go ahead, Mr. Droz. A Okay. So - sorry. What is your question? Q Do you recognize these documents? A I mean, documents, no, but the boards, yes. Jay Ses. Jay Ses. Page 34 Page 34 Q Okay. What are those boards? A Those boards are early version of the GBr2 transmit boards. Q Okay. What are those boards? A Those boards are early version of the GBr2 transmit boards. Q Okay. Hyou would look - you can use the magnifying glass if it would be helpful. It's 14:49:47 MR. CHATTERJEE: I just got them. Page 34 Page 34 Page 34 Page 34 Page 34 Page 36 A No. Just discovered it today. You just to do me, bascally. A The exact differences, no. I mean, it's like, a small improvement, better version, bence the different in the output. Jay Sut these ones would have the different in the output. A The exact differences, no. I mean, it's like, a small improvement, better version, bence the different in the output. A The exact differences, no. I mean, it's like, a small improvement, better version, bence the different in the output. A The exact differences would have the different in the output. A The exact differences, no. I mean, it's like, a small improvement, better version, bence the different in the output. A The exact differences would have the difference is between A The exact differences would have the difference is between A The exact differences would have the difference is between A The exact differences would have the difference is between A The exact differences would have the difference is between A The exact differences would have the difference is between A The exact differences would have the difference is between A The exact differences would have the difference is between A The exact differen		*		
MR. CHATTERJEE: It is now. MR. JAFFE: You're just making available that you had devices in discovery? MR. CHATTERJEE: Jisst got them. MR. JAFFE: From where? MR. AFFE: From where? MR. CHATTERJEE: Jisst got them. MR. JAFFE: From where? MR. CHATTERJEE: Jisst got them. MR. JAFFE: From where? MR. CHATTERJEE: Yesterday. You'll find out soon enough. O Go ahead, Mr. Droz. A Okay. So - sorry. What is your question? Q Do you recognize these documents? A I mean, documents, no, but the boards, yes. Page 34 Q Do you recognize these documents? A I mean, documents, no, but the boards, yes. Page 34 Q Okay. What are those boards? A Those boards are early version of the GBr2 transmit boards. Q Okay. What are those boards? A Those boards are early version of the GBr2 transmit boards. Q Okay. If you would look - you can use the magnifying glass if it would be helpful. It's MR. CHATTERJEE: List got them. A Yeah, this is just discovered it today. You just told mee, basically. A The exact differences, no. I mean, it's like, a small improvement, better version, hence the different in the output. A The exact differences, no. I mean, it's like, a small improvement, better version, hence the different in the output. A The exact differences, no. I mean, it's like, a small improvement, better version, hence the different in the output. A The exact differences, no. I mean, it's like, a small improvement, better version, hence the different in the output. A The exact differences, no. I mean, it's like, a small improvement, better version, hence the different in the output. A The exact differences, no. I mean, it's like, a small improvement, better version, hence the different in the output. A The exact differences, no. I mean, it's like, a small improvement, better version, bence the different in the output. A The exact differences no. I mean, it's like, a small improvement, better version, bence the different in the output. A The exact differences no. I mean, it's like, a small improvement, better version, bence t				
told me, basically. MR. JAFFE: You're just making available that you had devices in discovery? MR. CHATTERJEE: Just got them. MR. JAFFE: From where? MR. MR. CHATTERJEE: Just got them. MR. JAFFE: From where? MR. CHATTERJEE: Yesterday. You'll find out soon enough. A Code out soon enough. A Okay. So sorry. What is your question? A I mean, documents, no, but the boards, yes. Page 34 A I mean, documents, no, but the boards, yes. Page 34 Page 34 A Those boards are early version of the GBr2 transmit boards. Q Okay. What are those boards? A Those boards are early version of the GBr2 transmit boards. Q Okay. If you would look you can use the magnifying glass if it would be helpful. It's the magnifying glass if it would be helpful. It's Q Own, there's something attached to the side of those. Do you see those? Do you know what those are? A Those look at those, can I tell that there are: A Yes, I thou would jook. The left one 14:50:04 A Yes, I this is just bare PCB. Q Now, when I look at those, can I tell that there are: Jon 12: A A Catually, left merephrase what I just said. This one doesn't have diodes. The left one 14:50:04 A A Catually, left merephrase what I just said. This one doesn't have diodes. The left one 14:50:04 A A Catually, left merephrase what I just said. This one doesn't have diodes. The left one 14:51:40 Q Now, when I look at those, can I tell that there are: Jon 12: A A Those look at those, can I tell that there are: Jon 12: A A Catually. A Yeah. Can I see? Q This is the version, correct? A Yeah. Can I see? Q This is the version, correct? A Yeah. Can I see? Q Do you know if the size for those Jon 20: Jon 20: Jon 20: Jon 20: A Yeah. Can I see? A I man ot sure. I don't know. That I Jon 20: Jon 30: Jon 20: Jon 20: Jon 20: Jon 20: Jon 20: Jon 20: Jon		-		
that you had devices in discovery? MR. CHATTERJEE: I just got them. MR. JAFFE: From where? MR. CHATTERJEE: Yesterday. You'll find out soon enough. Q Go ahead, Mr. Droz. 14:49:23 A Okay, So sorry. What is your question? Q Do you recognize these documents? A I mean, documents, no, but the boards, yes. 14:49:38 Q Do you recognize these documents? A I mean, documents, no, but the boards, yes. 14:49:38 1 Q Okay. What are those boards? 1 Q Okay. What are those boards? 2 A Those boards are early version of the GBr2 2 A Those boards are early version of the GBr2 3 Do you see that? A Yeah, this is just bare PCB. Q Now, when I look at those, can I tell that there are meanfilying glass if it would be helpful. It's 14:49:47 B A Yeah, this is just bare PCB. Q Now, when I look at those, can I tell that there are meanfilying glass if it would be helpful. It's 14:49:47 B A Yeah, this is just bare PCB. Q Now, when I look at those, can I tell that there are meanfilying glass if it would be helpful. It's 14:49:47 B A Actually, let me rephrase what I just said. This one doesn't have diodes. The left one 14:5 2 A They look like ear—how do you 2 call it? Like, earring rings. A Yes, that would be two versions of it. Q Ow, there's something attached to the 2 side of those. Do you see those? Do you know what 14:50:10 1 those are? A They look like ear—how do you 2 call it? Like, earring rings. A No, I'm not. Q Okay. And so you're 14:50:26 A They look like ear—how do you're 14:50:26 A Poson were not familiar with 2 O Okay. And so you're 14:50:26 A Poson were not a — at a party where they gave these to her as a giff when she left the company? 14:50:23 A Yeah. Can I see? A I am not sure. I don't know. That I don't know. I have leaven they are, what — 14:52:38 A I am not sure. I don't know. That I don't know. I have				
16 MR. CHATTERJEE: I just got them. 16 MR. JAFFE: From where?				· · · · · · · · · · · · · · · · · · ·
MR. JAFFE: From where? MR. CHATTERIE: Yesterday. You'll find out soon enough. Q Go ahead, Mr. Droz. 14:49:23 A Okay. Sosorry. What is your question? Q User and the many of the many first would be helpful. It's 14:49:47 A Those boards are early version of the GBr2 transmit boards. Q Okay. Hyou would lookyou can use the mangifying glass if it would be helpful. It's 14:49:47 B A Yes, that would be two versions of it. Q Now, there's something attached to the side of those. Do you see those? Do you know what those are? A They look like ear like I don't know. I think they look like ear how do you call it? Like, earing frings. Q A rey ou familiar with anyone giving carrings riggs to someone as a gift? A No, I'm not. Q Okay, And so you're not familiar with Seval Oc? A Page 34 A Yeah, this is just bare PCB. Q Now, when I look at those, can I tell that there are be in? A Yeah, this is just bare PCB. A Yeah, this is just bare PCB. Q Now, when I look at those, can I tell that there are be in? A A Catually, let me rephrase what J just said. This is one doesn't have diodes. The left one 14:5 does have diodes. Q But you can actually see them on there, right? A Yeah. Can I see? Q Are you familiar with anyone giving 14:50:16 earrings giving the printed circuit boards as carrings to someone as a gift? A Yes, I couldn't tell you if they're what size they are, what 14:52:18 Q Do you know if the size for those carrings riggs to someone as a gift? A I am not sure. I don't know. That I don't know. I know that the learnings and the filt be in the company? A Yeah. Can I see? Q Do you know if the size for those carrings riggs. A I am not sure. I don't know. That I don't know. I know that the learnings and the little bit. So it's possible that they learning that, fine totally not familiar with it. Q Okay. And so you're not familiar with it. Q Oyou wen not fit his carring riggs. A I am not sure. I don't know. That I don't know. I know that the learning that provide and the learning r				
MR. CHATTERJEE: Yesterday. You'll find out soon enough. Q Go ahead, Mr. Droz. 14:49:23 A Okay. So sorry. What is your question? A I mean, documents, no, but the boards, yes. Page 34 Q Do you recognize these documents? A I mean, documents, no, but the boards, yes. Page 34 Page 34 A Those boards are early version of the GBr2 A Those boards are early version of the GBr2 A Those boards are early version of the GBr2 A Those boards are early version of the GBr2 A Those boards are early version of the GBr2 A Those boards are early version of the GBr2 A Those boards are early version of the GBr2 A Those boards are early version of the GBr2 A Those boards are early version of the GBr2 A A Corrected. Yes, that would be two versions of it. A Yesh, this is just bare PCB. A Yeah, this is just bare PCB. I 4:51:49 A Yea		, ,		Do you know what the difference is between
out soon enough. Q Ga haed, Mr. Droz. 14:49:23 A Okay. So sorry. What is your question? Q Do you recognize these documents? A I mean, documents, no, but the boards, yes. Page 34 Q Okay. What are those boards? A Those boards are early version of the GBr2 A Those boards are early version of the GBr2 Tamsmit boards. Q Okay. If you would bok you can use the magnifying glass if it would be helpful. It's 14:49:47 B A Yesh, this is just bare PCB. Q Okay. If you would bok you can use the magnifying glass if it would be helpful. It's 14:49:47 B A Yesh, that would be two versions of it. Q Now, there's something attached to the side of those. Do you see those? Do you know what 14:50:04 those are? A They look like ear like I don't know. I think they look like ear how do you call it? Like, earring rings. A No, I'm not. Q Okay. And so you're not familiar with anyone giving carrings to someone as a gift? A Pan sory. I'm familiar with her, but her having that, I'm totally not familiar with her, but her they gave these to her as a gift when she left the company? 14:50:37 Iiike, a small improvement, better version, hence the different in the output. 14:51:31 Q But these ones would have clud Q But these ones would have the latest they are shew diodes in t. This is just bare PCB. A Yeah, this is just bare PCB. A Yeah Can I see? Q This is the verificate of the were latest there are lat				A TIL LICC Y
Q Go ahead, Mr. Droz. 14:49:23 21		-		
21 A Okay. So sorry. What is your question? 22 Q Do you recognize these documents? 23 A I mean, documents, no, but the boards, 25 yes. 14:49:38 Page 34 Page 34 1 Q Okay. What are those boards? 14:49:38 2 A Those boards are early version of the GBr2 2 transmit boards. 4 Q Okay. If you would look you can use the magnifying glass if it would be helpful. It's 14:49:47 5 the magnifying glass if it would be helpful. It's 14:49:47 6 Do you see that? 7 Do you see that? 8 A Yes, that would be two versions of it. 9 Q Now, there's something attached to the side of those. Do you see those? Do you know what 14:50:04 11 those are? 12 A They look like ear like I don't know. I think they look like ear how do you call if! Like, earring rings. 15 Q Are you familiar with anyone giving earrings to someone as a gift? 16 A No, firm not. 17 Q Okay. And so you're not familiar with Seval Oz? 18 A They notally not familiar with the someone gave these to her as a gift when she left the company? 14:50:37 20 But these ones would have the index of it. This is just bare PCB. 22 Q Now, when I look at those, can I tell that there are in it? 24 A A Catually, let me rephrase what I just said. This one doesn't have diodes. The left one 14:5 2 O But you can actually see them on there, right? 2 A Yeah. Can I see? 3 D A Yeah. Can I see? 4 A Yeah. Can I see? 4 A Yeah. Can I see? 5 Q And it also has the right? 6 A Yes, It does have lasers. 7 Q D And it also has the right? 8 A Yea, It don't know. I know that the changed fire right? 9 A Yea, I couldn't tell you if they're what size they are, what 14:52:18 9 Q Now, when I look at those, can I tell that there are in it? 14 A Yea, I can I see? 15 A They look like ear how do you can actually see them on there, right? 16 A Yea, I can I see? 17 A I man not use. I don't know. I know. That I don't know. I know that the changed the 14:52:18 18 A Post part of the		9		*
question? A I mean, documents, no, but the boards, yes. 14:49:38 Page 34 Q Okay. What are those boards? A Those boards are early version of the GBr2 transmit boards. Q Okay. If you would look — you can use the magnifying glass if it would be helpful. It's 14:49:47 A Yes, that would be two versions of it. Q Ow, where's something attached to the side of those. Do you see those? Do you know what 14:50:04 those are? A They look like ear — how do you call it? Like, earring rings. Q Are you familiar with anyone giving earlings in glass if it would be reard on the call it? Like, earring rings. Q Are you familiar with anyone giving earlings regiving the printed circuit boards as earrings - giving the printed circuit boards as earrings - giving the printed circuit boards as earrings to someone as a gift? A Poor on the carring rings. Q Okay. And so you're not familiar with anyone giving they fint totally not familiar with it. Q Okay. And so you're not familiar with it. Q Okay. And so you're not familiar with it. Q Okay. And so you're not familiar with it. Q Okay. And so you're not familiar with it. Q Okay. And so you're not familiar with it. Q Okay. And so you're not familiar with it. Q Okay. And so you're not familiar with it. Q Okay. And so you're not familiar with it. Q Okay. And so you're not familiar with it. Q Okay. And so you're not familiar with it. Q Okay. And so you're not familiar with it. Q Okay. And so you're not familiar with it. Q Okay. And so you're not familiar with it. Q Okay. And so you're not familiar with it. Q Okay. And so you're not familiar with it. Q Okay. And so you're not familiar with it. Q Okay. And so you're not familiar with it. Q Okay. And so you're not familiar with it. A Yes, I couldn't tell you if they're — what size they are, what — 14:52:18 A I man not sure. I don't know. That I don't know. I know that the changed lite bit. So it's possible that they 14:52:30 C A re you familiar with he. you familiar with it. Q Okay. And so you're not familiar with				•
Q Do you recognize these documents? A I mean, documents, no, but the boards, yes. Page 34 Q Okay. What are those boards? A Those boards are early version of the GBr2 transmit boards. Q Okay. If you would look – you can use the magnifying glass if it would be helpful. It's the magnifying glass if it would be helpful. It's Q Now, there's something attached to the side of those. Do you see that? A They look like ear-—like—I don't know. I think they look like ear-—how do you call if! Clike, earring rings. Q Are you familiar with anyone giving A No, I'm not. Q Okay. And so you're not familiar with Seval Oz? A Page 34 A It actually doesn't because it doesn't have diodes on it. This is just bare PCB. Q It would just have the PCB? A Yeah, this is just bare PCB. Q Now, when I look at those, can I tell that there are				-
A I mean, documents, no, but the boards, yes. 14:49:38 Page 34 Page 34 Page 36 1 Q Okay. What are those boards? 14:49:38 2 A Those boards are early version of the GBr2 3 transmit boards. 4 Q Okay. If you would look you can use the magnifying glass if it would be helpful. It's 14:49:47 6 and then Do you see that? 7 Do you see that? 8 A Yes, that would be two versions of it. 9 Q Now, there's something attached to the side of those. Do you see those? Do you know what 14:50:04 11 those are? 12 A They look like ear how do you call it's Like, earring rings. 14 Q Okay. If you would look you can use the magnifying glass if it would be two versions of it. 9 Q Now, there's something attached to the side of those. Do you see those? Do you know what 14:50:04 11 those are? 12 A They look like ear how do you call it's Like, earring rings. 13 know. I think they look like ear how do you call it's Like, earring rings. 14 Q Okay. And so you're not familiar with Seval Oz? 15 A Prasory. I'm familiar with her, but her having that, I'm totally not familiar with it. 19 Q Okay, And so you're not familiar with it. 20 Q So you were not at a at a party where they gave these to her as a gift when she left the company? 14:50:37		1	(22)	
Page 34 Page 34 Page 36 1 Q Okay. What are those boards? 14:49:38 A Those boards are early version of the GBr2 2 Q Now, when I look at those, can I tell that there are in the magnifying glass if it would be helpful. It's 14:49:47 Mand then on the magnifying glass if it would be helpful. It's 14:49:47 Mand then on the magnifying glass if it would be helpful. It's 14:49:47 Mand then on the magnifying glass if it would be helpful. It's 14:49:47 Mand then on the magnifying glass if it would be helpful. It's 14:49:47 Mand then on the magnifying glass if it would be helpful. It's 14:49:47 Mand then on the magnifying glass if it would be helpful. It's 14:49:47 Mand then on the magnifying glass if it would be helpful. It's 14:49:47 Mand then on the magnifying glass if it would be helpful. It's 14:49:47 Mand then on the magnifying glass if it would be helpful. It's 14:49:47 Mand then on the magnifying glass if it would be helpful. It's 14:49:47 Mand then on the magnifying glass if it would be helpful. It's 14:49:47 Mand then on the magnifying glass if it would be helpful. It's 14:49:47 Mand then on the magnifying glass if it would be helpful. It's 14:49:47 Mand then on the magnifying glass if it would be helpful. It's 14:49:47 Mand then on the magnifying glass if it would be helpful. It's 14:49:47 Mand then on the magnifying glass if it would be helpful. It's 14:49:47 Mand then on the magnifying glass if it would be helpful. It's 14:49:47 Mand then on the magnifying glass if it would be helpful. It's 14:49:47 Mand then on the magnifying glass if it would be helpful. It's 14:49:47 Mand then on the magnifying glass if it would be helpful. It's 14:49:47 Mand then on the magnifying glass if it would be helpful. It's 14:49:47 Mand then on the magnifying glass if it would be helpful. It's 14:49:47 Mand then on the magnifying glass if it would be helpful. It's 14:49:47 Mand then on the magnifying glass if it would be helpful. It's 14:49:47 Mand then on the magnifying glass if it would be helpful. I		-		•
Page 34 Page 34 Page 36 1 Q Okay. What are those boards? 14:49:38 2 A Those boards are early version of the GBr2 2 Q Now, when I look at those, can I tell that there are				
1 Q Okay. What are those boards? 14:49:38 2 A Those boards are early version of the GBr2 3 transmit boards. 4 Q Okay. If you would look — you can use 5 the magnifying glass if it would be helpful. It's 14:49:47 6 and then 7 7 Do you see that? 7 A Yeah, this is just bare PCB. 14:51:40 6 and then 7 8 A Yeah, this is just bare PCB. 14:51:40 7 Do you see that? 8 A Actually, let me rephrase what I just said. This one doesn't have diodes. The left one 14:5 does have diodes. 9 Q Now, there's something attached to the side of those. Do you see those? Do you know what 14:50:04 11 those are? 12 A They look like ear—like—I don't 12 A Corrected. Yes. It does have lasers. 13 know. I think they look like ear—how do you call it? Like, earring rings. 14 A Yeah, this is just bare PCB. 14:51:40 14 A Actually, let me rephrase what I just said. This one doesn't have diodes. The left one 14:5 does have diodes. 14:50:04 15 But you can actually see them on there, right? 16 A Corrected. Yes. It does have lasers. 17 Q And it also has the 12:51:11 18 A Yeah, this is just bare PCB. 14:51:40 19 A Actually, let me rephrase what I just said. This one doesn't have diodes. The left one 14:5 does have diodes. 14:50:40 14 A Actually, let me rephrase what I just said. This one doesn't have diodes. The left one 14:5 does have diodes. 14:50:40 15 A Yeah. Can I see? 16 Q This is the 19 Version, correct? 14:51:11 16 A Corrected. Yes. It does have lasers. 17 Q And it also has the 19 Version, correct? 14:51:11 18 A Yeah. Can I see? 19 A Yeah. Can I see? 10 Q This is the 19 Version, correct? 14:51:11 19 A Yeah. See, and the pour last of the see? 10 Q This is the 19 Version, correct? 14:51:11 10 A Corrected. Yes. It does have lasers. 11 A Yeah. Can I see? 12 A They look like ear—how do you see those? I don't know that the 19 Version, correct? 14:51:11 10 A Yeah. See, and I was a fine the pour last of the see, what — 14:52:18 11 A Yeah. See, and I was a fine the pour last of the see, what — 14:51:10 12 A Yeah. See, and I was a fine the pour last of the s	25	yes. 14:49:38	25	Q It would just have the PCB? 14:51:39
2 A Those boards are early version of the GBr2 3 transmit boards. 4 Q Okay. If you would look you can use 5 the magnifying glass if it would be helpful. It's 14:49:47 6 and then		Page 34		Page 36
2 A Those boards are early version of the GBr2 3 transmit boards. 4 Q Okay. If you would look you can use 5 the magnifying glass if it would be helpful. It's 14:49:47 6 and then	1	O Olive What are those boards? 14440-29	1	A Veak this is just how DCD 14:51:40
transmit boards. Q Okay. If you would look you can use the magnifying glass if it would be helpful. It's 14:49:47 5 said. This one doesn't have diodes. The left one 14:5 does have diodes. Do you see that? A Yes, that would be two versions of it. Q Now, there's something attached to the side of those. Do you see those? Do you know what 14:50:04 those are? A They look like ear like I don't think they look like ear how do you call it? Like, earring rings. Q Are you familiar with anyone giving 14:50:16 earrings giving the printed circuit boards as earrings to someone as a gift? A No, I'm not. A I'm sorry. I'm familiar with it. Q So you were not at a at a party where they gave these to her as a gift when she left the company? 14:50:37 A Yeah. Carl I see? A Actually, let me rephrase what I just said. This one doesn't have diodes. The left one 14:56 does have diodes. A Actually, let me rephrase what I just said. This one doesn't have diodes. The left one 14:56 does have diodes. A Cornected. Yes. It does have lasers. Q And it also has the version, correct? 14:51: A Yes, I couldn't tell you if they're what size they are, what 14:52:18 Q Do you know if the size for those shaded a little bit. So it's possible that they don't know. I know that the shaded they are they are these to Ms. Oz as a gift when she was leaving her employment A Yeah. 14:52:42				· · · · · · · · · · · · · · · · · · ·
4 Q Okay. If you would look — you can use 5 the magnifying glass if it would be helpful. It's 6 and then 7 Do you see that? 8 A Yes, that would be two versions of it. 9 Q Now, there's something attached to the 10 side of those. Do you see those? Do you know what 14:50:04 11 those are? 12 A They look like ear- — like — I don't 13 know. I think they look like ear- — how do you 14 call it? Like, earring rings. 15 Q Are you familiar with anyone giving 16 earrings — giving the printed circuit boards as 17 earrings to someone as a gift? 18 A No, I'm not. 19 Q Okay. And so you're not familiar with 19 Q Okay. And so you're not familiar with 10 Seval Oz? 11 A I'm sorry. I'm familiar with it. 12 Q So you were not at a — at a party where 14 they gave these to her as a gift when she left the 15 company? 14 A Actually, let me rephrase what I just 14 said. This one doesn't have diodes. The left one 14:55 14 does have diodes. 7 Q But you can actually see them on there, 14:50:04 10 Q This is the version, correct? 14:51: 16 Q And it also has the version, correct? 12 Q And it also has the version of they're — 14 A Yes, I couldn't tell you if they're — 14:52:18 15 Q Do you know if the size for those 16 Q Do you know if the size for those 17 ghanged from GBr2 to GBr3? 18 A I'm sorry. I'm familiar with 19 don't know. I know that the 20 Seval Oz? 21 A I'm sorry. I'm familiar with it. 22 Q Would you be concerned at all that someone 23 gave these to her as a gift when she left the 24 they gave these to her as a gift when she left the 25 company? 14:50:37		· .		
the magnifying glass if it would be helpful. It's 14:49:47 and then Do you see that? Do you see that? A Yes, that would be two versions of it. Results of those. Do you see those? Do you know what 14:50:04 those are? A They look like ear like I don't think they look like ear how do you call it? Like, earring rings. A They look like ear how do you call it? Like, earring rings. A Are you familiar with anyone giving 14:50:16 the earrings - giving the printed circuit boards as earrings to someone as a gift? A No, I'm not. Q Okay. And so you're not familiar with solor of the phaving that, I'm totally not familiar with it. Q So you were not at a at a party where they gave these to her as a gift when she left the company? 14:50:37 Said. This one doesn't have diodes. The left one 14:5 does have diodes. Q But you can actually see them on there, right? A Yeah. Can I see? Q And it also has the version, correct? 14:51:: A Corrected. Yes. It does have lasers. Q And it also has the version of the yerewhat size they are, whatwhat size they are, what what size they are, what under the size for those phanged from GBr2 to GBr3? A I am not sure. I don't know. That I don't know. I know that the changed the having that, I'm totally not familiar with it. Q So you were not at a at a party where they gave these to her as a gift when she left the company? 14:50:26 A Yeah. 14:50:26 A Yeah. 14:51:31:31:31:31:31:31:31:31:31:31:31:31:31				
and then Do you see that? A Yes, that would be two versions of it. Q Now, there's something attached to the side of those. Do you see those? Do you know what 14:50:04 those are? A They look like ear like I don't				
Do you see that? A Yes, that would be two versions of it. Now, there's something attached to the side of those. Do you see those? Do you know what those are? A They look like ear like I don't think they look like ear how do you call it? Like, earring rings. Q Are you familiar with anyone giving the printed circuit boards as earrings to someone as a gift? A No, I'm not. Q Okay. And so you're not familiar with er, but her having that, I'm totally not familiar with it. Q So you were not at a at a party where they gave these to her as a gift when she left the company? 14 Yeah. Can I see? Q This is the version, correct? 14:51:: A Corrected. Yes. It does have lasers. Q And it also has the right? A Yes, I couldn't tell you if they're what size they are, what 14:52:18 Q Do you know if the size for those langed from GBr2 to GBr3? A I am not sure. I don't know. That I don't know. I know that the changed a little bit. So it's possible that they 14:52:30 changed the Q Would you be concerned at all that someone gave these to Ms. Oz as a gift when she was leaving her employment A Yeah. A Yeah. Can I see? Q This is the version, correct? 14:51:: A Corrected. Yes. It does have lasers. Q And it also has the right? A Yes, I couldn't tell you if they're what size they are, what 14:52:18 A Yes, I couldn't tell you if they're what size they are, what 14:52:18 A I am not sure. I don't know. That I don't know. I know that the changed a little bit. So it's possible that they 14:52:30 changed the Q Would you be concerned at all that someone gave these to Ms. Oz as a gift when she was leaving her employment A Yeah. A Yeah. A Yeah. Can I see? A Yeah. Can I s				
A Yes, that would be two versions of it. Q Now, there's something attached to the side of those. Do you see those? Do you know what 14:50:04 those are? A They look like ear like I don't A Corrected. Yes. It does have lasers. Q And it also has the right? A Yes, I couldn't tell you if they're what size they are, what that size for those carrings to someone as a gift? A No, I'm not. Q Okay. And so you're not familiar with Q Okay. And so you're not familiar with A I am not sure. I don't know. That I don't know. I know that the changed a little bit. So it's possible that they A Yeah. Can I see? Q This is the version, correct? 14:51:: A Corrected. Yes. It does have lasers. Q And it also has the right? A Yes, I couldn't tell you if they're what size they are, what what size they are, what that size for those changed from GBr2 to GBr3? A I am not sure. I don't know. That I don't know. I know that the changed a little bit. So it's possible that they 14:52:30 changed a little bit. So it's possible that they 14:52:30 Changed the Q Would you be concerned at all that someone gave these to Ms. Oz as a gift when she was leaving her employment A Yeah. A Yeah. 14:51:				
9 Q Now, there's something attached to the 10 side of those. Do you see those? Do you know what 14:50:04 11 those are? 11 A Corrected. Yes. It does have lasers. 12 A They look like ear like I don't 13 know. I think they look like ear how do you 14 call it? Like, earring rings. 15 Q Are you familiar with anyone giving 14:50:16 16 earrings giving the printed circuit boards as 17 earrings to someone as a gift? 18 A No, I'm not. 19 Q Okay. And so you're not familiar with 19 Q Okay. And so you're not familiar with 20 Seval Oz? 14:50:26 21 A I'm sorry. I'm familiar with her, but her 22 having that, I'm totally not familiar with it. 23 Q So you were not at a at a party where 24 they gave these to her as a gift when she left the company? 14:50:37 25 A Yeah. 14:52:42		-		
side of those. Do you see those? Do you know what those are? 12				9
those are? 11 A Corrected. Yes. It does have lasers. 12 A They look like ear like I don't 13 know. I think they look like ear how do you 14 call it? Like, earring rings. 15 Q Are you familiar with anyone giving 16 earrings giving the printed circuit boards as 17 earrings to someone as a gift? 18 A No, I'm not. 19 Q Okay. And so you're not familiar with 20 Seval Oz? 14:50:26 21 A I'm sorry. I'm familiar with her, but her 22 having that, I'm totally not familiar with it. 23 Q So you were not at a at a party where 24 they gave these to her as a gift when she left the 25 company? 11 A Corrected. Yes. It does have lasers. 12 Q And it also has the 13 right? 14 A Yes, I couldn't tell you if they're what size they are, what 14:52:18 Q Do you know if the size for those 17 changed from GBr2 to GBr3? A I am not sure. I don't know. That I 19 don't know. I know that the 20 changed a little bit. So it's possible that they 21 changed the 22 Q Would you be concerned at all that someone 23 gave these to Ms. Oz as a gift when she was leaving 24 they gave these to her as a gift when she left the 25 company? 14:50:37				
12 A They look like ear like I don't 13 know. I think they look like ear how do you 14 call it? Like, earring rings. 15 Q Are you familiar with anyone giving 16 earrings giving the printed circuit boards as 17 earrings to someone as a gift? 18 A No, I'm not. 19 Q Okay. And so you're not familiar with 20 Seval Oz? 21 A I'm sorry. I'm familiar with her, but her 22 having that, I'm totally not familiar with it. 23 Q So you were not at a at a party where 24 they gave these to her as a gift when she left the 25 company? 12 Q And it also has the 13 right? 14 A Yes, I couldn't tell you if they're 15 what size they are, what 14:52:18 16 Q Do you know if the size for those 17 changed from GBr2 to GBr3? 18 A I am not sure. I don't know. That I 19 don't know. I know that the 20 changed a little bit. So it's possible that they 21 changed the 22 Q Would you be concerned at all that someone 23 gave these to Ms. Oz as a gift when she was leaving 24 her employment 25 company? 14:50:37				
know. I think they look like ear how do you 13 right? 14 call it? Like, earring rings. 15 Q Are you familiar with anyone giving 16 earrings giving the printed circuit boards as 17 earrings to someone as a gift? 18 A No, I'm not. 19 Q Okay. And so you're not familiar with 20 Seval Oz? 14 A Yes, I couldn't tell you if they're what size they are, what 14:52:18 Q Do you know if the size for those 17 changed from GBr2 to GBr3? A I am not sure. I don't know. That I 19 don't know. I know that the 20 changed a little bit. So it's possible that they 21 changed the 22 having that, I'm totally not familiar with it. 23 Q So you were not at a at a party where 24 they gave these to her as a gift when she left the 25 company? 14:50:37 18 A I am not sure. I don't know. That I 20 Changed a little bit. So it's possible that they 21 changed the 22 Q Would you be concerned at all that someone gave these to Ms. Oz as a gift when she was leaving her employment 25 A Yeah. 14:52:42				
14 call it? Like, earring rings. 15 Q Are you familiar with anyone giving 16 earrings giving the printed circuit boards as 17 earrings to someone as a gift? 18 A No, I'm not. 19 Q Okay. And so you're not familiar with 20 Seval Oz? 21 A I'm sorry. I'm familiar with her, but her 22 having that, I'm totally not familiar with it. 23 Q So you were not at a at a party where 24 they gave these to her as a gift when she left the 25 company? 14 A Yes, I couldn't tell you if they're 14:52:18 Q Do you know if the size for those Changed from GBr2 to GBr3? A I am not sure. I don't know. That I don't know. I know that the 26 changed a little bit. So it's possible that they 27 changed the 28 Q Would you be concerned at all that someone 29 gave these to Ms. Oz as a gift when she was leaving 20 her employment 21 A Yeah. 22 A Yeah. 23 A Yeah. 24 The you're not familiar with it. 25 A Yeah. 26 A Yeah. 27 A Yeah.		· · · · · · · · · · · · · · · · · · ·		
Q Are you familiar with anyone giving 14:50:16 15 what size they are, what 14:52:18 16 earrings giving the printed circuit boards as 17 earrings to someone as a gift? 18 A No, I'm not. 19 Q Okay. And so you're not familiar with 20 Seval Oz? 14:50:26 21 A I'm sorry. I'm familiar with her, but her 22 having that, I'm totally not familiar with it. 23 Q So you were not at a at a party where 24 they gave these to her as a gift when she left the 25 company? 14:50:37 15 what size they are, what 14:52:18 Q Do you know if the size for those 16 Q Do you know if the size for those 17 changed from GBr2 to GBr3? A I am not sure. I don't know. That I 20 changed a little bit. So it's possible that they 14:52:30 21 changed the 22 Q Would you be concerned at all that someone 23 gave these to Ms. Oz as a gift when she was leaving 24 her employment 25 A Yeah. 14:52:42		· · · · · · · · · · · · · · · · · · ·		
16 earrings giving the printed circuit boards as 17 earrings to someone as a gift? 18 A No, I'm not. 19 Q Okay. And so you're not familiar with 20 Seval Oz? 14:50:26 21 A I'm sorry. I'm familiar with her, but her 22 having that, I'm totally not familiar with it. 23 Q So you were not at a at a party where 24 they gave these to her as a gift when she left the 25 company? 16 Q Do you know if the size for those 26 Changed from GBr2 to GBr3? 27 A I am not sure. I don't know. That I 28 Changed a little bit. So it's possible that they 29 changed a little bit. So it's possible that they 20 Changed the 21 Changed the 22 Q Would you be concerned at all that someone 23 gave these to Ms. Oz as a gift when she was leaving 24 her employment 25 A Yeah. 14:52:42		, , ,		•
carrings to someone as a gift? 18 A No, I'm not. 19 Q Okay. And so you're not familiar with 20 Seval Oz? 14:50:26 21 A I'm sorry. I'm familiar with her, but her 22 having that, I'm totally not familiar with it. 23 Q So you were not at a at a party where 24 they gave these to her as a gift when she left the 25 company? 18 A I am not sure. I don't know. That I 19 don't know. I know that the 20 changed a little bit. So it's possible that they 21 changed the 22 Q Would you be concerned at all that someone 23 gave these to Ms. Oz as a gift when she was leaving 24 her employment 25 A Yeah. 17 Changed from GBr2 to GBr3? 26 A I am not sure. I don't know. That I 27 Changed a little bit. So it's possible that they 28 Q Would you be concerned at all that someone 29 gave these to Ms. Oz as a gift when she was leaving 20 her employment 21 A Yeah. 22 A Yeah. 23 A Yeah.				• •
A No, I'm not. 18 A I am not sure. I don't know. That I 19 Q Okay. And so you're not familiar with 20 Seval Oz? 14:50:26 21 A I'm sorry. I'm familiar with her, but her 22 having that, I'm totally not familiar with it. 23 Q So you were not at a at a party where 24 they gave these to her as a gift when she left the 25 company? 18 A I am not sure. I don't know. That I 20 changed a little bit. So it's possible that they 14:52:30 20 changed the 21 changed the 22 Q Would you be concerned at all that someone 23 gave these to Ms. Oz as a gift when she was leaving 24 her employment 25 A Yeah. 14:52:42				- · ·
19 Q Okay. And so you're not familiar with 20 Seval Oz? 14:50:26 21 A I'm sorry. I'm familiar with her, but her 22 having that, I'm totally not familiar with it. 23 Q So you were not at a at a party where 24 they gave these to her as a gift when she left the 25 company? 14:50:37 19 don't know. I know that the 20 changed a little bit. So it's possible that they 14:52:30 21 changed the 22 Q Would you be concerned at all that someone 23 gave these to Ms. Oz as a gift when she was leaving 24 her employment 25 A Yeah. 14:52:42				
20 Seval Oz? 14:50:26 21 A I'm sorry. I'm familiar with her, but her 22 having that, I'm totally not familiar with it. 23 Q So you were not at a at a party where 24 they gave these to her as a gift when she left the 25 company? 14:50:37 20 changed a little bit. So it's possible that they 14:52:30 21 changed the 22 Q Would you be concerned at all that someone 23 gave these to Ms. Oz as a gift when she was leaving 24 her employment 25 A Yeah. 14:52:42		· ·		
A I'm sorry. I'm familiar with her, but her having that, I'm totally not familiar with it. Q So you were not at a at a party where they gave these to her as a gift when she left the company? 14:50:37 Changed the Q Would you be concerned at all that someone gave these to Ms. Oz as a gift when she was leaving her employment A Yeah. 14:52:42		Q Okay. And so you're not familiar with		· · · · · · · · · · · · · · · · · · ·
having that, I'm totally not familiar with it. Q So you were not at a at a party where they gave these to her as a gift when she left the company? 14:50:37 Q Would you be concerned at all that someone gave these to Ms. Oz as a gift when she was leaving her employment A Yeah. 14:52:42	20	Seval Oz? 14:50:26		
Q So you were not at a at a party where they gave these to her as a gift when she left the company? 23 gave these to Ms. Oz as a gift when she was leaving 44 her employment 45 company? A Yeah. 14:52:42	21	A I'm sorry. I'm familiar with her, but her		_
24 they gave these to her as a gift when she left the 25 company? 14:50:37 24 her employment 25 A Yeah. 14:52:42	22	having that, I'm totally not familiar with it.		-
25 company? 14:50:37 25 A Yeah. 14:52:42	23	Q So you were not at a at a party where		
25 Company: 14.50.57	24	they gave these to her as a gift when she left the		* *
	25	company? 14:50:37	25	A Yeah. 14:52:42
Page 35 Page 37		Page 35		Page 37

Case 3:17-cv-00939-WHA Document 1551-5 Filed 09/13/17 Page 5 of 7

1	Q with Google? 14:52:42	1	MR. JAFFE: Same objection. 14:54:36
2	A Yes.	2	THE WITNESS: I'm not aware of that.
3	Q Why?	3	BY MR. CHATTERJEE:
4	A Because this is this is confidential	4	Q You're not aware of any instance where a
5	information. This is our designs. That's not 14:52:47	5	picture of a Google printed circuit board for LiDAR 14:54:4
6	something we should give to someone, especially if	6	was published in a catalog?
7	someone is leaving the company.	7	A A picture of no.
8	Q Would it surprise you that these earrings	8	Q Do you know why Anthony Levandowski was
9	were given to her on the Google facilities as a gift	9	not sued for trade secret misappropriation?
10	before she left? 14:53:00	10	MR. JAFFE: Object to form. And 14:55:12
11	MR. JAFFE: Object to form.	11	objection. Beyond the scope.
12	THE WITNESS: So let me put it this way:	12	What topic are we on here?
13	It would surprise me. If Anthony had done this, it	13	MR. CHATTERJEE: "All measures taken by
14	would surprise me less, but that's more just from my	14	Google and/or Waymo to protect trade secrets Waymo
15	knowledge of what 14:53:16	15	claims was misappropriated by Otto Trucking." 14:55:21
16	BY MR. CHATTERJEE:	16	Whether you sued him or not and why falls within
17		17	that.
18	Q If he hadn't given it to her but someone	18	MR. JAFFE: That is not a question for a
19	else had, would that surprise you? A It would, yes, probably.	19	fact witness. Is that is not within the scope
20	7.7.1	20	•
21	Q Where does Ms. Oz work now? 14:53:27 A I'm not sure. I know she was even like	21	MR. CHATTERJEE: He's a 30(b)(6) witness. 14:55:30 He can answer it. If he doesn't know, he can say he
		22	•
22	when she left Google, she was getting pretty an	23	doesn't know.
23	executive role, maybe CEO of some I don't know		MR. JAFFE: Objection. Beyond the scope.
24	exactly I didn't know Seval that well.	24	And I'm going to object to form.
25	Q Do you know if she's working on 14:53:45	25	THE WITNESS: I don't know why. 14:55:38
	Page 38		Page 40
1	self-driving car technologies? 14:53:47	1	MR. JAFFE: Oh. and I don't think it's 14:55:40
2	A I don't I don't know if she is.	2	MR. JAFFE: Oh, and I don't think it's 14:55:40 problematic given your answer, but I also just want
3		3	
4	Q Okay. I can take the earrings back. A Sure.	4	to caution you not to reveal any attorney-client communications.
	MR. CHATTERJEE: We'll make them available 14:53:55		BY MR. CHATTERJEE: 14:55:48
5		6	
6	for inspection whenever you want, Jordan. We'll	7	Q Do you know if Google does anything to
7	keep the pictures of the record just so it's clear	8	ensure compliance by vendors with respect to
8	what it was.	9	Google's confidential information associated with
9	THE WITNESS: Sorry.	10	its printed circuit boards? MD_IAFEE: Objection Powerd the score 14:56:01
10	MR. JAFFE: Thank you. 14:54:05	11	MR. JAFFE: Objection. Beyond the scope. 14:56:01
11	BY MR. CHATTERJEE:		THE WITNESS: So I know that we you
12	Q Are you aware	12	know, from a from talking with Tim Willis and
13	A I'm sorry.	13 14	seeing how the DSM team works, I know they do
14	Q No. You can hold on to that.		inspect the counter facilities. I think one of the
15	Are you aware of any vendors publishing 14:54:12	15	thing they check is how the information there is 14:56:17
16	pictures of printed circuit boards made	16	segmented into between different projects. I
17	A I mean of our circuit boards?	17	know we have NDAs put in place with vendors and, you
18	Q Let me ask it more precisely. That's a	18	know, subcontractors as well.
19	fair point.	19	BY MR. CHATTERJEE:
20	Are you aware of any vendors publishing 14:54:27	20	Q Do you know if they do any proactive 14:56:33
21	pictures of the printed circuit boards or designs of	21	monitoring to make sure that vendors aren't using
22	Google?	22	the information incorrectly?
23	MR. JAFFE: Object to form.	23	MR. JAFFE: Objection. Beyond the scope.
24	BY MR. CHATTERJEE:	24	Form. THE WITNESS: Livrous was do site visits. 14.56.422
25	Q For LiDAR devices? 14:54:36	25	THE WITNESS: I know we do site visits. 14:56:42
	Page 39		Page 41

Case 3:17-cv-00939-WHA Document 1551-5 Filed 09/13/17 Page 6 of 7

2	BY MR. CHATTERJEE: 15:48:44	1	footprints for as a recommendation for for 15:50:29
-	Q All right. Do you design printed circuit	2	implementation. In this case, you know, we we
3	boards?	3	use the recommendation. It's something that they
4	A I do design PCBs, yes.	4	give to us.
5	Q And when you design PCBs, do you refer to 15:48:55	5	MR. CHATTERJEE: I think I'm done with the 15:50:4
6	parts libraries at all?	6	30(b)(6). So we can move to the individual
7	MR. JAFFE: Objection. Beyond the scope.	7	deposition unless you guys have questions.
8	THE WITNESS: Do you mean, like, do I use	8	MR. JAFFE: I I didn't want to ruin
9	the parts libraries that	9	your flow here, but I need to go back to the little
10	BY MR. CHATTERJEE: 15:49:04	10	earrings that you put in front of Mr. Droz. 15:50:55
11	Q Correct.	11	Because Mr. Levandowski's deposition is
12	A I do use the the Google or Waymo parts	12	happening right now, did he give you those earrings?
13	libraries.	13	MR. CHATTERJEE: I I obtained the
14	Q And where do those parts of the parts	14	earrings. I don't have to disclose how I got them.
15	libraries come from? 15:49:13	15	I did an investigation. 15:51:11
16	A We make them. Either I or some some	16	MR. JAFFE: Did he point you to the
17	other people on the team.	17	earrings?
18	Q And is that information discerned from	18	MR. CHATTERJEE: I'm not putting this on
19	third-party sources that supply the parts?	19	the record. We're not discussing this.
20	MR. JAFFE: Object to form. 15:49:23	20	MR. JAFFE: He's being deposed right now. 15:51:16
21	THE WITNESS: I mean, the libraries we	21	MR. CHATTERJEE: That's fine.
22	make them. Like, it's not they don't come from	22	MR. JAFFE: We
23	third parties.	23	MR. CHATTERJEE: You can do whatever you
24	BY MR. CHATTERJEE:	24	want.
25	Q So none of the parts that are in that 15:49:29	25	MR. JAFFE: I'm entitled to the 15:51:20
	Page 86		Page 88
1	parts library are based upon data sheets or 15:49:31	1	opportunity 15:51:22
2	references from a third party?		
		2.	MR_CHATTERIEE: We're going off the
3		2	MR. CHATTERJEE: We're going off the record. When I I don't have to disclose my work
	MR. JAFFE: Object to form.	2 3 4	record. When I I don't have to disclose my work
3	MR. JAFFE: Object to form. THE WITNESS: They are based on data	3 4	record. When I I don't have to disclose my work product or my investigations.
3 4	MR. JAFFE: Object to form. THE WITNESS: They are based on data sheets, but the actual layouts and the 15:49:37	3 4 5	record. When I I don't have to disclose my work product or my investigations. MR. JAFFE: Where did they come from? We 15:51:25
3 4 5	MR. JAFFE: Object to form. THE WITNESS: They are based on data	3 4	record. When I I don't have to disclose my work product or my investigations. MR. JAFFE: Where did they come from? We want to depose where they came from. Tell me
3 4 5 6	MR. JAFFE: Object to form. THE WITNESS: They are based on data sheets, but the actual layouts and the 15:49:37 implementation in the database we usually do it	3 4 5 6	record. When I I don't have to disclose my work product or my investigations. MR. JAFFE: Where did they come from? We 15:51:25 want to depose where they came from. Tell me MR. CHATTERJEE: They came from Seval Oz.
3 4 5 6 7	MR. JAFFE: Object to form. THE WITNESS: They are based on data sheets, but the actual layouts and the 15:49:37 implementation in the database we usually do it ourselves.	3 4 5 6 7	record. When I I don't have to disclose my work product or my investigations. MR. JAFFE: Where did they come from? We 15:51:25 want to depose where they came from. Tell me MR. CHATTERJEE: They came from Seval Oz. MR. JAFFE: And how did you get them so we
3 4 5 6 7 8	MR. JAFFE: Object to form. THE WITNESS: They are based on data sheets, but the actual layouts and the 15:49:37 implementation in the database we usually do it ourselves. BY MR. CHATTERJEE:	3 4 5 6 7 8	record. When I I don't have to disclose my work product or my investigations. MR. JAFFE: Where did they come from? We 15:51:25 want to depose where they came from. Tell me MR. CHATTERJEE: They came from Seval Oz. MR. JAFFE: And how did you get them so we can depose that person?
3 4 5 6 7 8 9	MR. JAFFE: Object to form. THE WITNESS: They are based on data sheets, but the actual layouts and the 15:49:37 implementation in the database we usually do it ourselves. BY MR. CHATTERJEE: Q And they're deriven [sic] from the data	3 4 5 6 7 8 9	record. When I I don't have to disclose my work product or my investigations. MR. JAFFE: Where did they come from? We 15:51:25 want to depose where they came from. Tell me MR. CHATTERJEE: They came from Seval Oz. MR. JAFFE: And how did you get them so we can depose that person?
3 4 5 6 7 8 9	MR. JAFFE: Object to form. THE WITNESS: They are based on data sheets, but the actual layouts and the 15:49:37 implementation in the database we usually do it ourselves. BY MR. CHATTERJEE: Q And they're deriven [sic] from the data sheets? 15:49:51	3 4 5 6 7 8 9	record. When I I don't have to disclose my work product or my investigations. MR. JAFFE: Where did they come from? We 15:51:25 want to depose where they came from. Tell me MR. CHATTERJEE: They came from Seval Oz. MR. JAFFE: And how did you get them so we can depose that person? MR. CHATTERJEE: You can talk to Seval Oz. 15:51:3:
3 4 5 6 7 8 9 10	MR. JAFFE: Object to form. THE WITNESS: They are based on data sheets, but the actual layouts and the 15:49:37 implementation in the database we usually do it ourselves. BY MR. CHATTERJEE: Q And they're deriven [sic] from the data sheets? 15:49:51 MR. JAFFE: Object to form.	3 4 5 6 7 8 9 10	record. When I I don't have to disclose my work product or my investigations. MR. JAFFE: Where did they come from? We 15:51:25 want to depose where they came from. Tell me MR. CHATTERJEE: They came from Seval Oz. MR. JAFFE: And how did you get them so we can depose that person? MR. CHATTERJEE: You can talk to Seval Oz. 15:51:3 MR. JAFFE: So you're refusing to tell me
3 4 5 6 7 8 9 10 11	MR. JAFFE: Object to form. THE WITNESS: They are based on data sheets, but the actual layouts and the 15:49:37 implementation in the database we usually do it ourselves. BY MR. CHATTERJEE: Q And they're deriven [sic] from the data sheets? 15:49:51 MR. JAFFE: Object to form. THE WITNESS: They usually take the you	3 4 5 6 7 8 9 10 11	record. When I I don't have to disclose my work product or my investigations. MR. JAFFE: Where did they come from? We want to depose where they came from. Tell me MR. CHATTERJEE: They came from Seval Oz. MR. JAFFE: And how did you get them so we can depose that person? MR. CHATTERJEE: You can talk to Seval Oz. MR. JAFFE: So you're refusing to tell me how you got them?
3 4 5 6 7 8 9 10 11 12 13	MR. JAFFE: Object to form. THE WITNESS: They are based on data sheets, but the actual layouts and the 15:49:37 implementation in the database we usually do it ourselves. BY MR. CHATTERJEE: Q And they're deriven [sic] from the data sheets? 15:49:51 MR. JAFFE: Object to form. THE WITNESS: They usually take the you know, if data sheets give a specific footprint to	3 4 5 6 7 8 9 10 11 12 13	record. When I I don't have to disclose my work product or my investigations. MR. JAFFE: Where did they come from? We want to depose where they came from. Tell me MR. CHATTERJEE: They came from Seval Oz. MR. JAFFE: And how did you get them so we can depose that person? MR. CHATTERJEE: You can talk to Seval Oz. MR. JAFFE: So you're refusing to tell me how you got them? MR. CHATTERJEE: It's my work product. I
3 4 5 6 7 8 9 10 11 12 13	MR. JAFFE: Object to form. THE WITNESS: They are based on data sheets, but the actual layouts and the 15:49:37 implementation in the database we usually do it ourselves. BY MR. CHATTERJEE: Q And they're deriven [sic] from the data sheets? 15:49:51 MR. JAFFE: Object to form. THE WITNESS: They usually take the you know, if data sheets give a specific footprint to use, then we would use it; otherwise, we come up	3 4 5 6 7 8 9 10 11 12 13 14	record. When I I don't have to disclose my work product or my investigations. MR. JAFFE: Where did they come from? We want to depose where they came from. Tell me MR. CHATTERJEE: They came from Seval Oz. MR. JAFFE: And how did you get them so we can depose that person? MR. CHATTERJEE: You can talk to Seval Oz. MR. JAFFE: So you're refusing to tell me how you got them? MR. CHATTERJEE: It's my work product. I don't have to disclose how I do my investigations.
3 4 5 6 7 8 9 10 11 12 13 14	MR. JAFFE: Object to form. THE WITNESS: They are based on data sheets, but the actual layouts and the 15:49:37 implementation in the database we usually do it ourselves. BY MR. CHATTERJEE: Q And they're deriven [sic] from the data sheets? 15:49:51 MR. JAFFE: Object to form. THE WITNESS: They usually take the you know, if data sheets give a specific footprint to use, then we would use it; otherwise, we come up with our own footprint. 15:49:58	3 4 5 6 7 8 9 10 11 12 13 14 15	record. When I I don't have to disclose my work product or my investigations. MR. JAFFE: Where did they come from? We 15:51:25 want to depose where they came from. Tell me MR. CHATTERJEE: They came from Seval Oz. MR. JAFFE: And how did you get them so we can depose that person? MR. CHATTERJEE: You can talk to Seval Oz. 15:51:3: MR. JAFFE: So you're refusing to tell me how you got them? MR. CHATTERJEE: It's my work product. I don't have to disclose how I do my investigations. You want to disclose all your investigations? 15:51:43
3 4 5 6 7 8 9 10 11 12 13 14 15 16	MR. JAFFE: Object to form. THE WITNESS: They are based on data sheets, but the actual layouts and the 15:49:37 implementation in the database we usually do it ourselves. BY MR. CHATTERJEE: Q And they're deriven [sic] from the data sheets? 15:49:51 MR. JAFFE: Object to form. THE WITNESS: They usually take the you know, if data sheets give a specific footprint to use, then we would use it; otherwise, we come up with our own footprint. 15:49:58 BY MR. CHATTERJEE:	3 4 5 6 7 8 9 10 11 12 13 14 15	record. When I I don't have to disclose my work product or my investigations. MR. JAFFE: Where did they come from? We 15:51:25 want to depose where they came from. Tell me MR. CHATTERJEE: They came from Seval Oz. MR. JAFFE: And how did you get them so we can depose that person? MR. CHATTERJEE: You can talk to Seval Oz. 15:51:3 MR. JAFFE: So you're refusing to tell me how you got them? MR. CHATTERJEE: It's my work product. I don't have to disclose how I do my investigations. You want to disclose all your investigations? 15:51:43 Because you've waived privilege, and you're still
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	MR. JAFFE: Object to form. THE WITNESS: They are based on data sheets, but the actual layouts and the 15:49:37 implementation in the database we usually do it ourselves. BY MR. CHATTERJEE: Q And they're deriven [sic] from the data sheets? 15:49:51 MR. JAFFE: Object to form. THE WITNESS: They usually take the you know, if data sheets give a specific footprint to use, then we would use it; otherwise, we come up with our own footprint. 15:49:58 BY MR. CHATTERJEE: Q If I were to look at a print circuit	3 4 5 6 7 8 9 10 11 12 13 14 15 16	record. When I I don't have to disclose my work product or my investigations. MR. JAFFE: Where did they come from? We 15:51:25 want to depose where they came from. Tell me MR. CHATTERJEE: They came from Seval Oz. MR. JAFFE: And how did you get them so we can depose that person? MR. CHATTERJEE: You can talk to Seval Oz. 15:51:3: MR. JAFFE: So you're refusing to tell me how you got them? MR. CHATTERJEE: It's my work product. I don't have to disclose how I do my investigations. You want to disclose all your investigations? 15:51:43 Because you've waived privilege, and you're still stiffing us on it. MR. JAFFE: That these are completely
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	MR. JAFFE: Object to form. THE WITNESS: They are based on data sheets, but the actual layouts and the 15:49:37 implementation in the database we usually do it ourselves. BY MR. CHATTERJEE: Q And they're deriven [sic] from the data sheets? 15:49:51 MR. JAFFE: Object to form. THE WITNESS: They usually take the you know, if data sheets give a specific footprint to use, then we would use it; otherwise, we come up with our own footprint. 15:49:58 BY MR. CHATTERJEE: Q If I were to look at a print circuit board, how would I know what originated with a	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	record. When I I don't have to disclose my work product or my investigations. MR. JAFFE: Where did they come from? We 15:51:25 want to depose where they came from. Tell me MR. CHATTERJEE: They came from Seval Oz. MR. JAFFE: And how did you get them so we can depose that person? MR. CHATTERJEE: You can talk to Seval Oz. 15:51:3 MR. JAFFE: So you're refusing to tell me how you got them? MR. CHATTERJEE: It's my work product. I don't have to disclose how I do my investigations. You want to disclose all your investigations? 15:51:43 Because you've waived privilege, and you're still stiffing us on it.
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	MR. JAFFE: Object to form. THE WITNESS: They are based on data sheets, but the actual layouts and the 15:49:37 implementation in the database we usually do it ourselves. BY MR. CHATTERJEE: Q And they're deriven [sic] from the data sheets? 15:49:51 MR. JAFFE: Object to form. THE WITNESS: They usually take the you know, if data sheets give a specific footprint to use, then we would use it; otherwise, we come up with our own footprint. 15:49:58 BY MR. CHATTERJEE: Q If I were to look at a print circuit board, how would I know what originated with a third-party data sheet versus an original design	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	record. When I I don't have to disclose my work product or my investigations. MR. JAFFE: Where did they come from? We 15:51:25 want to depose where they came from. Tell me MR. CHATTERJEE: They came from Seval Oz. MR. JAFFE: And how did you get them so we can depose that person? MR. CHATTERJEE: You can talk to Seval Oz. 15:51:3 MR. JAFFE: So you're refusing to tell me how you got them? MR. CHATTERJEE: It's my work product. I don't have to disclose how I do my investigations. You want to disclose all your investigations? 15:51:43 Because you've waived privilege, and you're still stiffing us on it. MR. JAFFE: That these are completely separate issues. I'm trying to find out
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	MR. JAFFE: Object to form. THE WITNESS: They are based on data sheets, but the actual layouts and the 15:49:37 implementation in the database we usually do it ourselves. BY MR. CHATTERJEE: Q And they're deriven [sic] from the data sheets? 15:49:51 MR. JAFFE: Object to form. THE WITNESS: They usually take the you know, if data sheets give a specific footprint to use, then we would use it; otherwise, we come up with our own footprint. 15:49:58 BY MR. CHATTERJEE: Q If I were to look at a print circuit board, how would I know what originated with a third-party data sheet versus an original design from Google or Waymo? 15:50:18	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	record. When I I don't have to disclose my work product or my investigations. MR. JAFFE: Where did they come from? We 15:51:25 want to depose where they came from. Tell me MR. CHATTERJEE: They came from Seval Oz. MR. JAFFE: And how did you get them so we can depose that person? MR. CHATTERJEE: You can talk to Seval Oz. 15:51:3 MR. JAFFE: So you're refusing to tell me how you got them? MR. CHATTERJEE: It's my work product. I don't have to disclose how I do my investigations. You want to disclose all your investigations? 15:51:43 Because you've waived privilege, and you're still stiffing us on it. MR. JAFFE: That these are completely separate issues. I'm trying to find out MR. CHATTERJEE: They're not separate 15:51:47
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	MR. JAFFE: Object to form. THE WITNESS: They are based on data sheets, but the actual layouts and the 15:49:37 implementation in the database we usually do it ourselves. BY MR. CHATTERJEE: Q And they're deriven [sic] from the data sheets? 15:49:51 MR. JAFFE: Object to form. THE WITNESS: They usually take the you know, if data sheets give a specific footprint to use, then we would use it; otherwise, we come up with our own footprint. 15:49:58 BY MR. CHATTERJEE: Q If I were to look at a print circuit board, how would I know what originated with a third-party data sheet versus an original design from Google or Waymo? 15:50:18 MR. JAFFE: Object to form.	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	record. When I I don't have to disclose my work product or my investigations. MR. JAFFE: Where did they come from? We 15:51:25 want to depose where they came from. Tell me MR. CHATTERJEE: They came from Seval Oz. MR. JAFFE: And how did you get them so we can depose that person? MR. CHATTERJEE: You can talk to Seval Oz. 15:51:3 MR. JAFFE: So you're refusing to tell me how you got them? MR. CHATTERJEE: It's my work product. I don't have to disclose how I do my investigations. You want to disclose all your investigations? 15:51:43 Because you've waived privilege, and you're still stiffing us on it. MR. JAFFE: That these are completely separate issues. I'm trying to find out MR. CHATTERJEE: They're not separate 15:51:47 issues at all.
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	MR. JAFFE: Object to form. THE WITNESS: They are based on data sheets, but the actual layouts and the 15:49:37 implementation in the database we usually do it ourselves. BY MR. CHATTERJEE: Q And they're deriven [sic] from the data sheets? 15:49:51 MR. JAFFE: Object to form. THE WITNESS: They usually take the you know, if data sheets give a specific footprint to use, then we would use it; otherwise, we come up with our own footprint. 15:49:58 BY MR. CHATTERJEE: Q If I were to look at a print circuit board, how would I know what originated with a third-party data sheet versus an original design from Google or Waymo? 15:50:18 MR. JAFFE: Object to form. THE WITNESS: We don't have specifically a	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	record. When I I don't have to disclose my work product or my investigations. MR. JAFFE: Where did they come from? We 15:51:25 want to depose where they came from. Tell me MR. CHATTERJEE: They came from Seval Oz. MR. JAFFE: And how did you get them so we can depose that person? MR. CHATTERJEE: You can talk to Seval Oz. 15:51:3: MR. JAFFE: So you're refusing to tell me how you got them? MR. CHATTERJEE: It's my work product. I don't have to disclose how I do my investigations. You want to disclose all your investigations? 15:51:43 Because you've waived privilege, and you're still stiffing us on it. MR. JAFFE: That these are completely separate issues. I'm trying to find out MR. CHATTERJEE: They're not separate issues at all. MR. JAFFE: where these came from.
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	MR. JAFFE: Object to form. THE WITNESS: They are based on data sheets, but the actual layouts and the 15:49:37 implementation in the database we usually do it ourselves. BY MR. CHATTERJEE: Q And they're deriven [sic] from the data sheets? 15:49:51 MR. JAFFE: Object to form. THE WITNESS: They usually take the you know, if data sheets give a specific footprint to use, then we would use it; otherwise, we come up with our own footprint. 15:49:58 BY MR. CHATTERJEE: Q If I were to look at a print circuit board, how would I know what originated with a third-party data sheet versus an original design from Google or Waymo? 15:50:18 MR. JAFFE: Object to form. THE WITNESS: We don't have specifically a footprint here. It usually are you know, like,	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	record. When I I don't have to disclose my work product or my investigations. MR. JAFFE: Where did they come from? We 15:51:25 want to depose where they came from. Tell me MR. CHATTERJEE: They came from Seval Oz. MR. JAFFE: And how did you get them so we can depose that person? MR. CHATTERJEE: You can talk to Seval Oz. 15:51:3 MR. JAFFE: So you're refusing to tell me how you got them? MR. CHATTERJEE: It's my work product. I don't have to disclose how I do my investigations. You want to disclose all your investigations? 15:51:43 Because you've waived privilege, and you're still stiffing us on it. MR. JAFFE: That these are completely separate issues. I'm trying to find out MR. CHATTERJEE: They're not separate 15:51:47 issues at all. MR. JAFFE: where these came from. Who is the custodian of these?

Case 3:17-cv-00939-WHA Document 1551-5 Filed 09/13/17 Page 7 of 7

1 MR. JAFFE: Okay. And 15:51:55 1 I, the undersigned, a Certified Shortha Reporter of the State of California, do here certify: We're going off the record. Let's take a break. 15:52:01 5 before me at the time and place herein set that any witnesses in the foregoing proceed the record. MR. JAFFE: That's fine. We can go off the record. THE VIDEOGRAPHER: Okay. We're going off the record. The time is 3:52 p.m., and this concludes today's testimony given by Pierre-Yves The total number of media used was one and I, the undersigned, a Certified Shortha Reporter of the State of California, do here certify: That the foregoing proceedings were to before me at the time and place herein set that any witnesses in the foregoing proceed prior to testifying, were administered an o a record of the proceedings was made by to machine shorthand which was thereafter to under my direction; that the foregoing is a record of the testimony given.	eby iken forth; lings,
3 have them. 4 We're going off the record. Let's take a 5 break. 6 MR. JAFFE: That's fine. We can go off 7 the record. 8 THE VIDEOGRAPHER: Okay. We're going off 9 the record. The time is 3:52 p.m., and this 10 concludes today's testimony given by Pierre-Yves 11 Drog. The total number of media used was one and	iken forth; lings,
We're going off the record. Let's take a break. 15:52:01 MR. JAFFE: That's fine. We can go off the record. THE VIDEOGRAPHER: Okay. We're going off the record. The time is 3:52 p.m., and this concludes today's testimony given by Pierre-Yves The total number of media used was one and That the foregoing proceedings were to before me at the time and place herein set that any witnesses in the foregoing proceed reprior to testifying, were administered an oral a record of the proceedings was made by a machine shorthand which was thereafter to under my direction; that the foregoing is a record of the testimony given.	forth; lings,
break. 15:52:01 5 before me at the time and place herein set that any witnesses in the foregoing procee that any witnesses in the foregoing procee prior to testifying, were administered an o a record of the proceedings was made by the record. The time is 3:52 p.m., and this concludes today's testimony given by Pierre-Yves 15:52:07 10 proz. The total number of media used was one and the time and place herein set that any witnesses in the foregoing procee prior to testifying, were administered an o a record of the proceedings was made by the record. The time is 3:52 p.m., and this under my direction; that the foregoing is a record of the testimony given.	forth; lings,
6 MR. JAFFE: That's fine. We can go off 7 the record. 8 THE VIDEOGRAPHER: Okay. We're going off 9 the record. The time is 3:52 p.m., and this 10 concludes today's testimony given by Pierre-Yves 11 Drog. The total number of media used was one and 11 Drog. The total number of media used was one and 12 record of the testimony given. 6 that any witnesses in the foregoing procee prior to testifying, were administered an oa a record of the proceedings was made by 1 machine shorthand which was thereafter to under my direction; that the foregoing is a record of the testimony given.	dings,
the record. THE VIDEOGRAPHER: Okay. We're going off the record. The time is 3:52 p.m., and this concludes today's testimony given by Pierre-Yves The total number of media used was one and the record of the testimony given. The total number of media used was one and the record of the testimony given.	
THE VIDEOGRAPHER: Okay. We're going off the record. The time is 3:52 p.m., and this concludes today's testimony given by Pierre-Yves to prog. The total number of media used was one and total number of media used was one and total number of media used was one and total number of	ith; that
the record. The time is 3:52 p.m., and this concludes today's testimony given by Pierre-Yves concludes today's testimony given by Pierr	
9 the record. The time is 3:52 p.m., and this 10 concludes today's testimony given by Pierre-Yves 11 Prog. The total number of media used was one and 11 Prog. The total number of media used was one and	
10 concludes today's testimony given by Pierre-Yves 15:52: 17 10 under my direction; that the foregoing is a record of the testimony given.	
11 Proz. The total number of media used was one and 11 record of the testimony given.	true
12 Further, that if the foregoing pertains t	
original transcript of a deposition in a Fed	
L4 Case, before completion of the proceeding	
15 of the transcript [] was [] was not reque	sted.
15 I further certify that I am neither	
16 17 financially interested in the action nor a re	lative
17 and 18 or employee of any attorney or any party t	
19 action.	
19 20 IN WITNESS WHEREOF, I have this	date
20 21 subscribed my name.	
21 Dated: 8/23/17	
22 23	
23 <%signature%>	
24 Catherine A. Ryan, RMR, CRR	
25 CSR No. 8239	
Page 90 Pag	e 92
I, PIERRE-YVES DROZ, do hereby declare under penalty of perjury that I have read the foregoing transcript; that I have made any corrections as appear noted, in ink, initialed by me, or attached hereto; that my testimony as contained herein, as corrected, is true and correct. EXECUTED this day of 2017, at, (City) (State) PIERRE-YVES DROZ VOLUME I PIERRE-YVES DROZ 10 11 12 13 PIERRE-YVES DROZ VOLUME I 19 20 21 22	
23 24 25	
Page 91	